

# Christopher H. Grigorian Partner

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Christopher H. Grigorian has extensive experience representing motor vehicle manufacturers and major parts suppliers in National Highway Traffic Safety Administration (NHTSA) matters. He is a partner and chair of the firm's NHTSA & Motor Vehicle Safety Practice, as well as co-chair of the Trade Association Practice.

Chris regularly represents clients in matters involving safety recalls, defect investigations and related enforcement proceedings, compliance with Federal motor vehicle safety standards, regulation of autonomous and electric vehicles, safety review processes and procedures, rulemaking proceedings, FOIA and confidentiality matters, and other compliance issues under the National Traffic and Motor Vehicle Safety Act, TREAD Act, and NHTSA's implementing regulations and agency guidelines.

He represents a wide range of clients, including manufacturers of cars, trucks, buses, recreational vehicles, and motorcycles, as well as original equipment and aftermarket suppliers of lighting, airbags and passenger restraint systems, engines, EV batteries, active safety systems, transmissions, tires, child restraints, electronics, driveline components, brake components, filtration products, hoses, emissions and exhaust components, and ride control products, among others.

Chris advises industry associations on motor vehicle safety issues, including representation in rulemaking proceedings and advising association members on compliance issues. In addition, he advises clients on Federal and California emissions certification and compliance. Chris also counsels clients on related commercial and supply chain issues. He also advises trade association clients on the wide-ranging legal issues these entities face. He serves as general counsel to two trade associations, for which he oversees antitrust, governance, commercial, and employment-related matters.

Chris began his legal career with the U.S. Department of Justice, Tax Division, where he spent five years as a trial attorney and senior trial attorney litigating tax cases in federal courts throughout the United States. He received the Tax Division's Outstanding Attorney Award in 1994.



### **Awards and Recognition**

Chambers USA has recognized Chris as one of America's leading lawyers in Transportation: Road
(Automotive), noting that clients described him as "exceptionally knowledgeable and very responsive."
(2013 – 2023)

#### **Presentations and Publications**

- Presenter, "U.S. Legal Issues and Current Developments Around Migrating to Electric Vehicles,"
   National Auto Parts Industry (INA) (Mexico), March 7, 2022
- Panelist, "Original Equipment Suppliers Association Mobility Supplier Forum," Palo Alto, CA (August 25, 2022)
- Co-author, "Top Legal Issues Facing the Automotive Industry in 2022," White Paper, Detroit, MI (March 2022)
- Presenter, "How Automotive Companies Can Prepare for Upcoming Changes to International Trade, Labor, Environmental, and Safety Rules," Foley & Lardner Webinar (March 9, 2021)
- Co-author, "Top Legal Issues Facing the Automotive Industry in 2020," White Paper, Detroit, MI (January 2021)
- Quoted, "AV standards slowed, not stopped, by pandemic," Automotive World (June 1, 2020)
- Quoted, "What's the post-COVID outlook for CASE?" Automotive World (May 27, 2020)
- Co-author, "NHTSA Takes Another Step Forward in Removing Regulatory Barriers for Automated Driving Systems," Dashboard Insights (March 26, 2020)
- Presenter, "Auto-Tech Mission Program," Palo Alto, CA (March 3, 2020)
- Co-author, "Top Legal Issues Facing the Automotive Industry in 2020," White Paper, Detroit, MI (January 2020)
- Mentioned, "Driving the Future of Automotive Technology," *Dashboard Insights* (December 12, 2019)
- Presenter, "Critical Risk Issues for In-House Counsel: Planning for 2020," Original Equipment Suppliers Association, Detroit, MI (October 8, 2019)
- Co-author, "Congress Taking Another Look at Regulating Automated Driving Systems," Dashboard Insights (September 10, 2019)
- Co-author, "Balancing Regulation and Innovation: How NHTSA is Approaching Motor Vehicle Safety in 2019," Dashboard Insights (March 5, 2019)
- Moderator, "Navigating the Road Ahead ... Are You Ready?," Dashboard Insights (February 14, 2019)
- Co-author, "Top Legal Issues Facing the Automotive Industry in 2019," White Paper, Detroit, MI (January 2019)
- Panelist, "Concordant Crossroads: Regulation and Innovation in the Automotive Industry," Thomson Reuters Legal Executive Institute, New York, NY (October 4, 2019)
- Panelist, "Emerging Automotive Technologies: Tomorrow's Trends Today," Foley & Lardner's Emerging Tech Program, Boston, MA (May 22, 2018)
- Co-author, "NHTSA and Motor Vehicle Safety," Dashboard Insights (March 1, 2018)
- Panelist, "RVIA Annual NHTSA Compliance Seminar," Recreation Vehicle Industry Association (May 1, 2018; May 2, 2017; and May 4, 2016)



- Author, "NHTSA's Approach to Autonomous Vehicles Taking Form," WardsAuto (February 22, 2018)
- Author, "Driverless Cars Should be New Legislative Priority for Congress," The Hill (January 24, 2018)
- Quoted, "The 4 Hottest Practice Areas For 2018," Law360 (January 1, 2018)
- Co-author, "Top Legal Issues Facing the Automotive Industry in 2018," White Paper, Detroit, MI (January 2018)
- Panelist, "Connected Vehicles and Emerging Technologies in the Automotive Industry," Foley & Lardner Emerging Tech Program, Palo Alto, CA (October 24, 2017)
- Author, "SELF DRIVE Act Passes the House as Senate Prepares Its Own Bill," Dashboard Insights (September 11, 2017)
- Quoted, "3 Takeaways From The Self-Driving Car Bill," Law360 (September 8, 2017)
- Author, "Late to the Scene, the "Safely Ensuring Lives Future Deployment and Research In Vehicle Evolution Act" ("SELF DRIVE Act") Seeks to Set Course for Future Development," *Dashboard Insights* (July 31, 2017)
- Presenter, "Product Safety Recall The Decision Process," Product Safety & Compliance Seminar, Association of Equipment Manufacturers, Indianapolis, IN (April 24 26, 2017)
- Author, "V2V Communications: Motor Vehicle Safety Guidelines," Dashboard Insights (March 16, 2017)
- Author, "Automated Vehicles: NHTSA Has Spoken," Dashboard Insights (March 13, 2017)
- Author, "Cybersecurity: Yes, They Will Hack Your Car," Dashboard Insights (March 9, 2017)
- Author, "NHTSA Issues Recommended Best Practices for Protective Orders and Settlement Agreements in Private Litigation," *Dashboard Insights* (March 24, 2016)
- Author, "Proactive Safety Principles Agreement Reached with NHTSA" (January 25, 2016)
- Author, "2016 Outlook: NHTSA, Automotive Safety, and Cybersecurity" (January 21, 2016)
- Co-author, "Top Legal Issues Facing the Automotive Industry in 2016," White Paper, Detroit, MI (January, 2016)
- Author, "NHTSA Announces Record Setting Civil Penalty in Consent Order With Chrysler," Dashboard Insights (August 3, 2015)
- Author, "Under The Hood: NHTSA's Reporting Requirements," Law360 (July 7, 2015)
- Author, "DOT Issues Scathing Internal Report of NHTSA's Defect Investigation Processes," Dashboard Insights (June 29, 2015)
- Author, "NHTSA Seeks to Push Beyond the 'New Normal' and into the 'New Paradigm'," Dashboard Insights (June 11, 2015)
- Co-author, "5 Antitrust Lessons for Trade Associations From 2 Recent FTC Challenges," Westlaw Journal Antitrust (June 2015)
- Author, "What's Next for NHTSA and Automotive Safety," WardsAuto (May 8, 2015)
- Author, "NHTSA's Enforcement Priorities Made Clear in U.S. DOT's Transportation Bill (Grow America Act)," Dashboard Insights (April 27, 2015)
- Panelist, "Lessons Learned from Recent Recalls," KPMG Legal & Compliance Share Forum, Los Angeles, CA (November 20, 2014)
- Author, "NHTSA's September Scrutiny," Dashboard Insights (October 2, 2014)



- Author, "A Busy Year for NHTSA Enforcement and Rulemaking," Dashboard Insights (September 18, 2014)
- Author, "NHTSA and GM Agree to Resolve Timeliness Claims Related to Ignition Switch Recall,"
   Dashboard Insights (May 20, 2014)
- Author, "A Peek at the NHTSA Provisions in the U.S. DOT's Transportation Bill," Dashboard Insights (May 5, 2014)
- Co-author, "How Auto Suppliers Can Prepare for Recalls," Law360 (May 1, 2014)
- Author, "Expect a Busy Year for NHTSA Rulemaking and Enforcement," Automotive World (April 28, 2014)
- Co-author, "Top Legal Issues Facing Automotive Suppliers in 2014," White Paper, Detroit, MI (January, 2014)
- Author, "New Requirements for NHTSA Recalls and Early Warning Reporting Become Effective October 21," Dashboard Insights (October 17, 2013)
- Author, "Auto Parts Distributor Avoids Liability In Robinson-Patman Suit," Dashboard Insights (August 12, 2013)
- Author, "U.S. Department of Transportation Inspector General Issues Report of Audit of NHTSA's Office of Defects Investigation" (October 1, 2011)
- Co-author, "Recent Developments in Food and Product Safety Policy Affecting Importers and Foreign Suppliers" (October 14, 2009)
- Author, "Plastech-Chrysler Dispute Illustrates Challenges for Suppliers to Recover Tooling" (March 24, 2008)
- Author, "Foreign Tire Sales, Inc.'s Recall of Imported Tires: Lessons for Parts Importers Regarding NHTSA and Product Liability Responsibility" (July 7, 2007)

#### **Sectors**

- Automotive
- Manufacturing

#### **Practice Areas**

- Antitrust & Competition
- Corporate
- Environmental
- Government Solutions
- NHTSA & Motor Vehicle Safety
- Public Policy & Government Relations
- Trade Associations
- Transportation Regulatory

#### Education

American University Washington College of Law (J.D., 1989)



■ George Washington University (B.B.A., 1986)

## **Admissions**

- District of Columbia
- Maryland
- U.S. District Court
  - Colorado
  - District of Columbia
  - District of Maryland
- U.S. Court of Appeals
  - District of Columbia
  - Fourth Circuit
  - Seventh Circuit

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